

1 Gregory L. Bentley, Esq.  
4631 Birch Street  
2 Newport Beach, CA 92660  
Tel.: (949) 870-3800 ext. 228  
3 Email: gbentley@bentleymore.com

4 Pro se

5 William D. Shapiro, Esq.  
893 E. Brier Drive  
6 San Bernardino, CA 92408  
Tel.: (877) 611-1529  
7 Email: bill@wshapiro.com

8 Pro se

9  
10 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF OHIO**  
11 **EASTERN DIVISION**

12 DIGITAL MEDIA SOLUTIONS, LLC,

13 Plaintiff,

14 vs.

15 SOUTH UNIVERSITY OF OHIO, LLC, et al.

16 Defendants.  
17

CASE NO. 1:19 CV 145

Assigned to United States District Judge Dan  
Aaron Polster and United States Magistrate  
Judge Thomas M. Parker

**NOTICE OF APPEARANCE AND  
NOTICE OF INTENTION TO BID ON  
PURCHASE OF ASSETS OF WESTERN  
STATE COLLEGE OF LAW**

18 TO THE COURT:

19 Notice of Appearance

20 Gregory L. Bentley, Esq. and William D. Shapiro, Esq., both in pro se, herewith enter  
21 their appearance in this action and request copies of all pleadings, orders and other matters be sent  
22 to/served upon them. Contact information is set forth above.

23 Notice of Intention to Bid on Purchase of Assets of Western State College of Law

24 Mr. Bentley and Mr. Shapiro are both practicing lawyers in California. They are alumni  
25 of Western State College of Law ("WSCL") and very supportive of the school. Having become  
26 aware of this action through the substantial publicity it has generated and, equally as important,  
27 communications with administrators, including Dean Allen Easley, alumni, students, third party  
28

1 school operators, and local Congressmembers, and having reviewed that certain Settlement  
2 Agreement dated February 27, 2019 (the "Settlement Agreement") among Mr. Dottore, the court-  
3 appointed receiver herein, and numerous other parties, a copy of which is attached hereto as  
4 Exhibit "A" and those certain Minutes of Proceedings and Order filed on March 13, 2019 (Doc.  
5 No. 162) (the "March 13 Order"), a copy of which is attached hereto as Exhibit "B," Mr. Bentley  
6 and Mr. Shapiro, request to intervene in this matter in an attempt to either directly or indirectly  
7 through an entity submit a bid to purchase the assets of WSCL pursuant to paragraph 7 of Exhibit  
8 A, and/or continue to meet with and find a suitable buyer that is afforded reasonable opportunity  
9 to conduct due diligence, and communicate with the Department of Education and ABA about the  
10 viability of the transaction.

11 In this regard, the Court's attention is invited to paragraph 7 of the Settlement Agreement  
12 (Exhibit "A" hereto). This paragraph references the Effective Date of the Settlement Agreement  
13 as of February 27, 2019. Based thereon, as indicated above, Mr. Bentley and Mr. Shapiro would  
14 request the opportunity to continue evaluating the viability of timely submitting an offer to  
15 purchase the assets of WSCL by March 26, 2019 which is 30 days after the Effective Date as  
16 specified in the Settlement Agreement.

17 Mr. Bentley and Mr. Shapiro are also aware of an issue respecting the lack of identified  
18 funds needed to pay for expenses to operate WSCL until the end of the semester. While it  
19 appears the Receiver has the funds and is ordered to pay the funds for payroll for the indicated  
20 time frame, there appears to be additional funds needed for operations. Mr. Bentley and Mr.  
21 Shapiro are also prepared to address the viability of raising necessary funds, subject to normal  
22 due diligence, with respect thereto.

### 23 Request to Appear and be Heard

24 Mr. Bentley and Mr. Shapiro respectfully request this Court's consent to appear in this  
25 matter and be heard, including the hearing set for March 18, 2019 at 1:30 p.m.  
26  
27  
28

1 Dated: March 15, 2019

2 Respectfully submitted,

3  
4 /s/ Gregory L. Bentley  
Gregory L. Bentley, Esq.

5  
6 /s/ William D. Shapiro  
William D. Shapiro, Esq.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28